

EXHIBIT 13

RESPONSE TO OMNIBUS OBJECTION

I. CONTACT INFORMATION

Name: Marina Crispin Santiago

Mailing Address P.O. Box 987
Luquillo, PR 00773

Contact Phone Home: _____ Cell 347-514-0242

Claim Number: 176233

II. Caption

A. Clerk's Office

United States District Court
Room 150 Federal Building
San Juan Puerto Rico 00918-1767

B. Commonwealth of Puerto Rico et al. (Debtors)

C. Case Number: 17 BK 3283-LTS

D. Omnibus Objection regarding amounts not paid by the Commonwealth of Puerto Rico:

Evidence by proof of claim numbers:

Act 124 – 1973 Wage Increase

#49762 – Act 89 – *Romerazo* – Effective July 1, 1995

Act 89 – 1979 Uniform Compensation

#94057 – June 6, 2008 Pay Scale Act – Step Increases

#96621 – Act 96 (2002) of Dr. Pedro Rosello – effective July 2002

Act 164 (2004) of Ms. Sila Calderón – effective January 2004

III. The court should not grant the Omnibus Objection, because these amounts are owed based on the following laws passed by the government of the Commonwealth of Puerto Rico:

Act 124 – 1973 Wage Increase

Act 89 “*Romerazo*” – Effective July 1, 1995

Act 89 – 1979 Uniform Compensation

June 6, 2008 Pay Scale Act – Step Increases

Act 96 (2002) of Dr. Pedro Rosello – effective July 2002

Act 164 (2004) of Ms. Sila M. Calderón, effective January 2004

IV. Supporting Documentation

Enclosed are documents evidencing the years of service with the Puerto Rico Telephone Company, *Fajardo*, Puerto Rico, from the 28th of October of 1971 through the 1st of May of 1992. I ended my career as a Supervisor with the Puerto Rico Telephone Company, *Fajardo*, Puerto Rico, Commonwealth. Claim is made under the applicable laws that cover these years of service.

Enclosed are documents in support of this claim.

Due to the recent emergency situation in Puerto Rico brought on by earthquakes and COVID-19, the responses are being sent on today's date. Please contact me should any additional information or documents be needed.

Marina Crispín Santiago

Printed name

[signature]

Signature

PS: The PRTC was an agency of the government until 1999, when it was sold by the governor in office at the time and it became a private agency.

My claim is based on money owed for wage increases under laws that were enacted during the years that the PRTC belonged to the Commonwealth.

I hope you will consider my claim.

Sincerely,

[signature]

Case:17-03283-LTS Doc#:20133-1 Filed:02/14/22 Entered:02/15/22 11:24:41 Desc:
Exhibit Page 1 of 1



PRT/CLARO
P.O. Box 360998
San Juan PR 00936-0998

CERTIFICATION

MARINA CRISPIN SANTIAGO
XXX-XX-1838

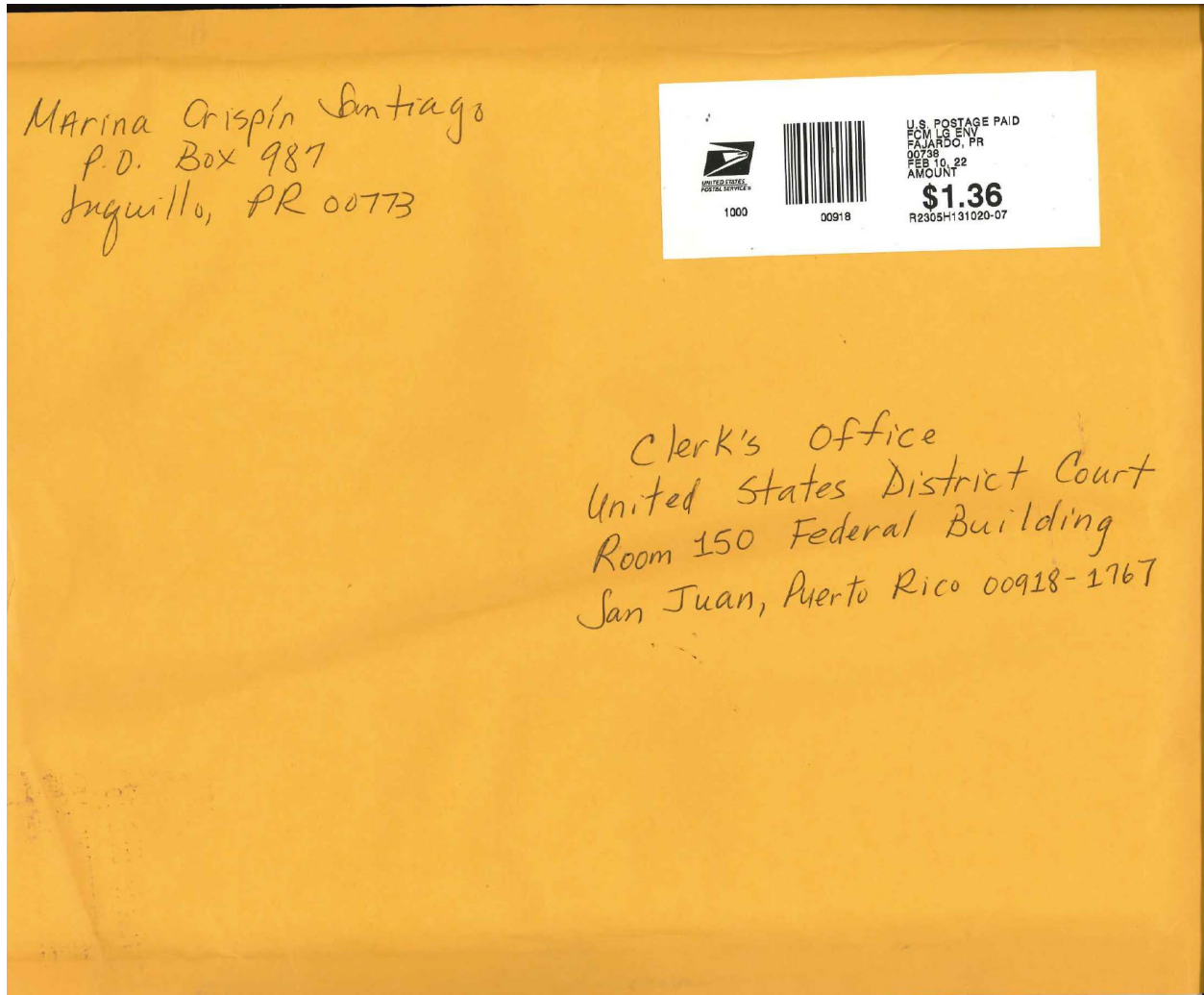
For the former employee referenced above, we certify the following:

- She joined PRT/Claro effective 10/28/1971.
- She worked as a regular employee through 05/01/1992.

This certification confirms that the information was obtained from our personnel information system. In Guaynabo, Puerto Rico, on Saturday, September 12, 2020.

Abigail Alejandro González

Abigail Alejandro González
Compensation Officer
Compensation and Records





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TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)

TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 176233 DN 20133**

Signed this 5th of June 2022



Verify at www.atanet.org/verify

A handwritten signature in blue ink, appearing to read "Andreea I. Boscor".

Andreea I. Boscor

